

EXHIBIT D

Chevron Corporation v. Steven Donziger, et al.**Summary of Deposits Into Steven R. Donziger's TD Bank Accounts - Post 3/4/14 RICO (by Total Deposits)**

#	Entity Name	Total Deposits	# of Deposits	First Deposit Date	Last Deposit Date
1	Lenczner Slaght Royce Smith	\$ 625,940.00	6	5/10/2016	2/21/2017
2	Forum Nobis, PLLC [1]	342,045.16	1	5/8/2018	5/8/2018
3	George R Waters	150,000.00	3	1/25/2016	12/11/2017
4	BBVA Compass	135,306.41	2	5/12/2014	6/25/2015
5	Streamline Family Office Inc	125,000.00	3	1/30/2018	3/13/2018
Subtotal - 5 Entities Who Deposited More than \$10,000 Post RICO Judgement Date [2]		\$ 1,378,291.57	15	5/12/2014	5/8/2018
Remaining 10 Entities Who Deposited Less than \$10,000.		24,973.61	140	3/11/2014	6/25/2018
Total [3]		\$ 1,403,265.18	155	3/11/2014	6/25/2018

Notes:

[1] The wire transfer from Forum Nobis was used to fund the opening of TD Bank account 8132. Two days later (May 10, 2018), the same amount was transferred out of this account and used to fund the opening of TD Bank account 8174. On the same day, \$50,000 was wired back to Forum Nobis, while one-half of the remaining funds (\$160,000) was used to fund two other Donziger TD Bank accounts.

Description of Activity	Date	Inflow	Outflow
Activity for X8132			
Incoming wire from Forum Nobis	5/8/2018	342,045.16	
Transfer to X8174	5/10/2018		342,045.16
Activity for X8174			
Transfer from X8132	5/10/2018	342,045.16	
Wire to Forum Nobis	5/10/2018		50,000.00
Transfer to X8783	5/10/2018		125,000.00
Transfer to X8132	5/10/2018		35,000.00

[2] Kroll excluded deposits for the following entities: Charles Schwab; Argyle Knoxville, LLC; United States Treasury; CitiBank; State of New York; and Unknown.

[3] Kroll excluded transactions from this analysis that were identified as internal transfers as well as bounced checks/returned items.

Chevron Corporation v. Steven Donziger, et al.**Detail of Deposits Into Steven R. Donziger TD Bank Accounts - Post 3/4/14 RICO (by Entity and Total Amount of Deposits Greater than \$10,000)**

#	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount	Bates Ref. (TDBank)
1	Donziger & Associates	8783	5/10/2016	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	74,990.00	406
2	Donziger & Associates	8783	7/19/2016	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	104,990.00	410
3	Donziger & Associates	8783	10/6/2016	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	143,490.00	416
4	Donziger & Associates	8783	10/21/2016	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	99,990.00	416
5	Donziger & Associates	8783	12/19/2016	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	64,990.00	421
6	Donziger & Associates	8783	2/21/2017	Wire Transfer	Lenczner Slaght Royce Smith	Donziger & Associates	137,490.00	426
Lenczner Slaght Royce Smith Total							\$ 625,940.00	
7	Steven R. Donziger	8132	5/8/2018	Wire Transfer	Forum Nobis, PLLC	Steven R. Donziger	342,045.16	484
Forum Nobis, PLLC Total							\$ 342,045.16	
8	Steven R. Donziger	2265	1/25/2016	Wire Transfer	George R Waters	Steven R. Donziger	50,000.00	169
9	Donziger & Associates	8783	2/14/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00	426
10	Donziger & Associates	8783	12/11/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00	452
George R Waters Total							\$ 150,000.00	
11	Steven R. Donziger	2265	5/12/2014	Deposit	BBVA Compass	Steven R. Donziger	20,000.00	79
12	Steven R. Donziger	6418	6/25/2015	Deposit	BBVA Compass	Steven R. Donziger	115,306.41	288
BBVA Compass Total							\$ 135,306.41	
13	Donziger & Associates	8783	1/30/2018	Wire Transfer	Streamline Family Office Inc	Donziger & Associates	25,000.00	456
14	Donziger & Associates	8783	2/5/2018	Deposit	Streamline Family Office Inc	Donziger & Associates	25,000.00	460
15	Donziger & Associates	8783	3/13/2018	Wire Transfer	Streamline Family Office Inc	Donziger & Associates	75,000.00	464
Streamline Family Office Inc Total							\$ 125,000.00	
Subtotal - 5 Entities Who Deposited More than \$10,000							\$ 1,378,291.57	